

## **DNR Response to Public Comments on Section 4 of the Draft Michigan State Forest Management Plan**

December 28, 2007

The majority of comments on the DRAFT Michigan State Forest Management Plan were related to Section 4 (Statewide Management Direction). A few key areas stood out including vegetation management issues, roads, technical issues and process. Comments not related to the SFMP or the planning process will not be addressed here but were provided to appropriate staff. Examples include a suggestion to train loggers to assist in fire control, implementation of Part 525's four pilot project areas to demonstrate cost savings techniques, and changing the Operations Inventory/Compartment Review cycle.

### *The Michigan State Forest Management Plan*

The SFMP is one of many strategic and tactical documents that provide direction for the management of natural resources. The SFMP is more of a strategic document. The intent of the Plan is to convey the desired future direction of the State Forest System, recognizing that it is intermingled with other ownerships and that it is a significant contributor to multiple natural resources values.

The Department of Natural Resources (DNR) is committed to the conservation, protection, management, use and enjoyment of the State's natural resources for current and future generations. The DNR is also committed to the principles of ecosystem-based management. These principles recognize that there are biological, social and economic factors of natural resource management. The SFMP reflects this orientation noting that management goals are measured against a range of socially-acceptable, economically-viable, and ecologically-sound standards. Management goals are not set by nor evaluated against just one ecologically-based or economically-based standard.

### *Concept of Desired Future Condition*

The Desired Future Condition (DFC) statements are intended to serve as vision statements for the direction of resources or resource-related activities. The DFC is framed by legal and administrative direction established through the Executive, Legislative and Judicial branches of state and federal government. Some direction is codified in law while other direction may have evolved over time. The SFMP reflects the current understanding and interpretation of this direction is not intended to evaluate or determine the relative importance, priority or value of a resource or resource related activity.

Goals and objectives in each subsection provide more detail for moving toward and/or achieving the DFC visions. Background on how plan objectives were developed has been added to the plan. Plans at the ecoregional level, as well as programmatic plans, will provide more specific direction for achieving the DFC visions.

It is not surprising that there are both real and perceived conflicts among the desired future conditions contained in the plan. Likewise, some objectives tied to the goals are contrary to each other. This circumstance is inherent when managing a broad array of natural resources for multiple values and benefits.

### *Fiscal Concerns*

Comments related to budget and funding included concerns about having the financial resources to carry out objectives and goals in the Plan, advocating dedicated funding for specific activities (e.g. access and the transportation system), detailing the source of funds, and conducting analysis on which activities are cost effective.

The SFMP provides strategic direction for management of state forest lands, and is not a financial plan. Determining appropriations for natural resource management activities is an annual endeavor by the Legislative Branch. The SFMP presents a broad range of desired activities, funding and implementation of Plan elements will be depend current and future fiscal realities.

### *Process Issues*

Comments encouraged process transparency and public participation, and expressed concern that there was too much or too little influence exerted by various stakeholder groups.

A wide range of individuals, organizations, agencies and stakeholder groups had and took the equal opportunity to review the Plan, and no one group had a disproportionate influence upon its construction. Public participation and stakeholder consultation were key components to developing the Plan and are key to many of the processes used by the Department. Ecoteams will be forming Regional Advisory Committees to assist with Regional Plan development. The Department uses different consultation forums and will continue to adapt these mechanisms.

Comments expressed that compartment review (especially for northern hardwoods) should move to a continuous cycle as IFMAP is fully implemented. The SFMP recognizes that the 10-year entry cycle may be an inadequate period for the management of northern hardwoods since growth over that period is usually inadequate for a commercial sale, and the management trend has been moving to a 20-year cycle. The SFMP has being revised to access the social, administrative and economic costs and benefits associated with managing northern hardwoods under a continuous inventory cycle. Some activities (e.g. salvage operations and the red pine project) currently take place outside of the ten-year cycle.

## *Technical Concerns*

Numerous comments were related to community and species composition, age classes, and the techniques or practices used to maintain, convert or enhance them. The question of “how much” of a community, species or age class was frequently raised.

For example, there were diverse views about early successional (primarily aspen) management, its impact on forest industry, biological diversity and wildlife habitat (game and non-game) as well as maintaining a disturbed, compositionally and structurally-simplified landscape. Along the same lines, there were comments about the conversion of forests to other types, specifically with respect to aspen, oak, expanding mesic conifer components of forests, and the restoration and expansion of savannah communities.

Many of the comments explicitly addressing timber harvesting were in favor of increasing harvests (from current levels) of mature and over-mature forest stands. However, there were some comments opposed to increased harvests. Likewise, there were a variety of comments with respect to increasing or decreasing savannahs and wildlife openings, restoring mesic conifers, and maintaining or expanding early successional and late successional communities. Opposing views often used different temporal and spatial benchmarks (ranging from circa-1800 to mid-20<sup>th</sup> century to present day) for as a basis for determining how much of a particular resource is appropriate at the present. These different benchmarks lead to different conclusions about whether increasing, decreasing or maintaining current conditions and activities is appropriate. The SFMP is an effort to strike a balance between these competing public desires, through management direction that takes information from all of these various benchmarks into consideration, and balances them with current or desired uses (timber, habitat, recreation, biodiversity, etc) and the context of legal and administrative responsibilities.

Much concern was expressed in comments about losses in the acreage of aspen and oak cover types via succession to other cover types, with advocacy of proactive measures for no net loss of acreage for these cover types. These issues are addressed in the SFMP, with recognition that continuing management of the aspen type will slow, but not halt a gradual loss of a small percentage of this type over the coming decades. The situation with oak is more tenuous as much of it is or is becoming overmature and it often has proven difficult to regenerate. The SFMP specifies proactive measures for oak management, but also recognizes that some of those measures will be to retain oak as a component in mixed pine stands.

A large number of comments encouraged the inclusion of a minimum sustainable harvest level in the state forest system for a variety of uses, including fiber production, recreation, wildlife and biodiversity, with a specific desire to increase fiber production to help sustain the forest products industry. A “minimum sustainable harvest level” is open to interpretation. Some interests believe it to mean harvesting all unutilized annual growth of forest resources whereby removals approximately equate to annual regeneration and growth, while others may define it as a zero harvest level, neither of which are socially, economically, nor ecologically desirable. The emphasis in the SFMP

is on establishing objectives which guide timber harvests and the management of specific forest types. It describes influences on current conditions and harvest levels and the capability of forest types to sustain timber harvests. Taking all of these factors into account, the SFMP incorporates the expectation that total sustainable timber harvests will remain close to current levels.

Other comments expressed that the SFMP placed too much emphasis on endangered species. The DNR is mandated to recognize and protect these species by Part 365, Endangered Species Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451. Consideration of these species in management plans is largely through a habitat approach to management consistent with the DNR Wildlife Action Plan.

Both comments and the SFMP identified deficiencies related to state forest access, a road and trail inventory and long term transportation management. Comments advocated both for and against SFMP goals to minimize permanent and temporary roads. For wildlife, social, administrative, and ecological reasons, the emphasis of the SFMP is not on maintaining all roads. Temporary roads are meant to be just that -- temporary. A major impetus to closing roads is the lack of a budget or mechanism for funding maintenance of the State Forest road system and the lack of maintenance can lead to serious erosion and sedimentation problems. Concurrent with this impetus, the SFMP is also committed to providing reasonable recreational trail resources. Plan goals also begin to address road and trail inventory and maintenance issues.

A very positive consequence of developing and vetting the SFMP has been the identification of plans, guidelines, practices and activities that are not aligned, are disparate or even possibly counterproductive. The SFMP describes present natural resource conditions, present management directions and expected future outcomes based on that direction.

Comments raised issues about whether techniques and standards in the SFMP are consistent with other plans. For example, the clearcut block size in the draft Kirtlands Warbler recovery plan recommends a maximum block size of 550 acres whereas Pigeon River Country Concept of Management standards are that blocks should not exceed 40 acres. New guidelines were added to address this issue.

It is incumbent on the Department to assess inconsistencies and work toward resolution through proper processes and channels. In some situations these can be resolved within the Department's authority, while others may require Executive or Legislative clarification. For example, comments stated concerns about use of native species for regeneration. The use of native species for restoration on state forest land is within the Department's purview, and revisions to the SFMP and the Soil and Water Quality Manual have been made to reflect their use.